IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

HAWAII STRUCTURAL IRONWORKERS : No. 1:18-cv-00299-AJN-SLC

PENSION TRUST FUND, Individually and on

Behalf of All Others Similarly Situated, : Final Approval Hearing: : February 10, 2022 at 3:00 PM

Plaintiff,

.

v.

:

AMC ENTERTAINMENT HOLDINGS, INC.,

et al.,

Defendants. : January 6, 2022

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, EXPENSES, AND COMPENSATORY AWARDS

Lead Plaintiff, the International Union of Operating Engineers Pension Fund of Eastern Pennsylvania and Delaware ("Operating Engineers" or "Lead Plaintiff"), and Additional Plaintiff, Hawaii Iron Workers Pension Trust Fund ("Hawaii Iron Workers" or "Additional Plaintiff" and, together with Lead Plaintiff, "Plaintiffs"), on behalf of the Class, hereby move ("Motion"), pursuant to Federal Rule of Civil Procedure 23, for entry of an order: (i) awarding attorneys' fees of 33 1/3% of the Settlement Fund (\$6,000,000) plus accrued interest; (ii) payment of necessary and reasonable litigation expenses in the amount of \$1,290,333.96; and (iii) an award of \$4,625 to Lead Plaintiff and \$21,217.79 to Additional Plaintiff, pursuant to 15 U.S.C. §78u-4(a)(4).1

For the reasons set forth in the Memorandum of Law in support of this Motion and all supporting papers, as well as the record in this litigation, Plaintiffs respectfully submit that the

¹Capitalized terms not otherwise defined herein shall have the same meaning as in the Stipulation and Agreement of Settlement dated November 1, 2021 (ECF No. 214-1).

requested attorneys' fees, expenses, and compensatory awards are fair and reasonable.

Accordingly, Plaintiffs respectfully request that the Court enter an order approving this application for attorneys' fees, litigation expenses, and awards to Plaintiffs.

Plaintiffs stand ready to provide any additional information that the Court may require in connection with its consideration of this Motion.

Dated: January 6, 2022

Respectfully submitted,

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